



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
OREGON OPERATIONS OFFICE
805 SW Broadway, Suite 500
Portland, Oregon 97205

July 15, 2011

Mr. Bob Wyatt
Northwest Natural & Chairman, Lower Willamette Group
220 Northwest Second Avenue
Portland, OR 97209

Re: Portland Harbor Superfund Site; Administrative Order on Consent for Remedial Investigation and Feasibility Study; Docket No. CERCLA-10-2001-0240
Portland Harbor Feasibility Study (FS)

Dear Mr. Wyatt:

This letter provides EPA's feedback on the FS Key Elements Check-in Meeting held June 21 and 22, 2011 in Portland, and direction to the LWG on proceeding with preparation of the Draft Feasibility Study (FS) Report for the Portland Harbor Superfund Site.

EPA appreciates the LWG's presentation and the materials that were provided prior to the meeting. A significant amount of new information was provided at the meeting and EPA and its partners found the discussions very helpful in increasing our understanding of the LWG's approach for the draft FS. However, as noted by our questions and comments raised during the meeting, summary discussions at the project manager's meeting at the end of the second day, and our subsequent meeting with the senior managers on June 29, EPA has concerns with specific elements of the approach that need to be addressed in the draft FS.

EPA's comments reflect our ongoing concerns in several areas. First, we are concerned with the approach on monitored natural recovery (MNR), including the extent to which the draft FS appears to rely on MNR as the only alternative considered outside of proposed SMAs, the over reliance on the fate and transport model results to predict future concentrations, and how other lines of evidence, site conditions and monitoring will be used to confirm MNR is viable and to identify areas where conditions are not conducive to natural recovery. Second, EPA also has concerns about LWG's proposal to provide RALs for only 3 specific contaminants associated with human health risks, and the lack of an alternative based on cleanup to background levels of contamination. Third, EPA has other technical concerns with LWG's proposed approach, including, evaluation of subsurface sediment contamination, volume and cost determinations, consideration of dock and other structural removal as part of the analysis of alternatives, consideration of steep slopes in capping evaluations, and how the LWG will address DEQ's rules for hot spots in the draft FS.

EPA's comments reflect our primary concerns from the meeting presentations, but please note that there is a significant amount of additional detailed information that was not provided

because of the acknowledged limitations of a day and a half check-in. EPA is providing most of the attached comments as directed comments in order to expedite completion of the draft FS report, and to emphasize that these changes are required to produce a draft FS meeting EPA's expectations and providing the basis for EPA to develop a Proposed Plan for cleanup.

EPA is willing to meet to discuss ways to address these concerns in order to avoid impacts on the project schedule. EPA believes these discussions can occur in parallel with preparation of the report, and the LWG should proceed with preparation of the draft FS report. Also, EPA recognizes that additional technical discussions may be needed clarify EPA's direction on additional RALs and alternatives, including how the LWG would address our comments in the FS. EPA will extend the dispute deadline to 28 days for those issues with the expectation that those discussions will occur in the next two weeks.

If you have any questions regarding these matters please contact Chip Humphrey at (503) 326-2678 or Kristine Koch at (206) 553-6705. All legal inquiries should be directed to Lori Cora at (206) 553-1115.

Sincerely,

Chip Humphrey
Remedial Project Manager

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